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Attorneys for Defendant
NIANTIC, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NANTWORKS, LLC,
NANT HOLDINGS IP, LLC,

Plaintiffs,

v.

NIANTIC, INC.,

Defendant.

COOLEY LLP
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Case No. 3:20-CV-06262-LB

**DECLARATION OF MATTHEW J. BRIGHAM
IN SUPPORT OF MOTION TO EXCLUDE
TESTIMONY OF PLAINTIFFS' DAMAGES
EXPERT ALAN GOEDDE**

DATE: May 30, 2024
TIME: 9:30 a.m.

Courtroom B – 15th Floor
450 Golden Gate Ave.
San Francisco, CA 94102

1 I, Matthew J. Brigham, declare as follows:

2 1. I am an attorney at the law firm of Cooley LLP and am counsel for Defendant
3 Niantic, Inc. (“Niantic”) in the above-captioned case. I provide this declaration upon personal
4 knowledge and, if called upon as a witness, would testify competently as to the matters recited
5 herein.

6 2. Attached as **Exhibit A** is a true and correct copy of the Expert Report of Alan G.
7 Goedde, Ph.D., dated December 21, 2023, which was marked “CONFIDENTIAL – ATTORNEY’S
8 EYES ONLY” and is being filed under seal.

9 3. Attached as **Exhibit B** is a true and correct copy of excerpts from the deposition
10 transcript of Alan Goedde, dated March 12, 2024, which was marked “Highly Confidential –
11 Attorneys’ Eyes Only” and is being filed under seal.

12 4. Attached as **Exhibit C** is a true and correct copy of the Rebuttal Expert Report
13 Regarding Damages of Julia Rowe, dated February 2, 2024, which was marked “HIGHLY
14 CONFIDENTIAL – ATTORNEYS’ EYES ONLY” and is being filed under seal.

15 5. Attached as **Exhibit D** is a true and correct copy of excerpts from the deposition
16 transcript of Matthew Turk, Ph.D., dated March 20, 2024, which was marked “HIGHLY
17 CONFIDENTIAL” and is being filed under seal.

18 I declare under penalty of perjury under the laws of the United States of America that the
19 foregoing is true and correct.

20 Executed on April 18, 2024, in Palo Alto, California.

21
22 /s/ Matthew J. Brigham
23 Matthew J. Brigham
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